

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MARYANN BUTLER and PETIE DAVIS

Plaintiffs,

v.

NEW AMERICAN FUNDING

Defendant.

Case No. 1:25-cv-690

FILED
HARRISBURG, PA

JUN 27 2025

PER


DEPUTY CLERK

NOTICE OF STANDING CLARIFICATION AND PRE-SANCTIONS WARNING

Plaintiff Petie Davis hereby submits this Notice of Standing Clarification and Pre-Sanctions Warning to the Court and opposing counsel to ensure an accurate procedural record and preserve judicial economy in anticipation of further delays or evasive tactics by Defendant.

1. Standing Clarification:

Petie Davis is the Authorized Representative of co-plaintiff Maryann Butler and has actively participated in all material correspondence, documentation, and complaints since the inception of the FHA loan transaction in question. Plaintiff respectfully reaffirms that a motion to amend the complaint is pending to formally substitute Petie Davis as lead plaintiff due to his direct involvement, damages suffered, and personal representation capacity.

2. Procedural Context:

Defense counsel has filed a motion to extend (ECF No. 24) in response to filings which remain factually unopposed on the record. The motion references a pending amendment and attempts to delay further responsive obligations without directly addressing the core allegations or attached exhibits.

3. Pre-Sanctions Warning:

Should Defendant continue to evade substantive response to verified claims, fail to acknowledge preserved communications, or attempt further delay without good cause, Plaintiff reserves the right to move for sanctions under Rule 11 and/or Rule 37. All supporting materials, including preserved emails, voicemails, and federal complaints, have been made available to both the Court and defense counsel.

Plaintiff seeks a just, timely, and accountable response from the defense. The record is clear, exhibits are verified, and further delay will be treated as strategic evasion.

Respectfully submitted,

/s/ Petie Davis

Petie Davis, Pro Se

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Harrisburg, PA 17104

(717) 424-8220

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Date: June 27, 2025

VERIFICATION

I, Petie Davis, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: June 27, 2025

/s/ Petie Davis

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2025, a true and correct copy of the foregoing Notice of Standing Clarification and Pre-Sanctions Warning was served via email to the following:

James McNally

Counsel for Defendant

jmcnally@cohenseglia.com

/s/ Petie Davis